

# Lepage Environmental Services, Inc.

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February 28, 2001

Mr. Anthony Williams  
Public Works Environmental  
Naval Air Station Brunswick  
437 Huey Drive, Box 33  
Brunswick, ME 04011-5008

Subject: Review of the Second Draft *Consensus Statement, No Further Actions Required Under CERCLA for Sites 14, 15, 16, and 18*

Dear Mr. Williams:

As requested by the Brunswick Area Citizens for a Safe Environment (BACSE), Lepage Environmental Services, Inc., has reviewed the February 2001 Second Draft of the *Consensus Statement, No Further Actions Required Under CERCLA for Sites 14, 15, 16, and 18*. The following comments incorporate Mr. Ed Benedikt's and Mr. Tom Fusco's input on the document:

- 1. Signature Page.** It might help the public to better understand the limited nature of the investigations conducted at the four sites (and, therefore, that this consensus statement is the appropriate decision document) if the first sentence in the second paragraph were amended to say "...since the investigations of these sites ended with the Site Inspection (SI) phase and did not proceed to the Remedial Investigation/Feasibility Study stage." It would also be helpful to some members of the public to have "proposed plan" and "record of decision" (with the acronym ROD added) capitalized in the next sentence. The acronym FFA also requires explanation.
- 2. Signature Page.** The fourth paragraph should be revised to state that the No Further Action decision will be revisited by regulatory agencies should any (not just significant) changes or new information reveal the potential for adverse threats to human health or the environment. What is the mechanism for ensuring that future site owners or lessees are also informed of environmental issues should property be transferred again (and again) in the future?
- 3. Signature Page.** The Site Summaries in Attachment A should include reference citations within the text so the reader knows which reports provide the supporting documentation for the No Further Action decision for each site.

**4. Signature Page.** Attachment B should also include a figure for Site 18 that shows the seeps and other sampling locations, the former bunker, and the seven test pits. Each of the figures in Attachment B should include a footnote with the reference citation for the document the figure was pulled from. It would also be helpful if the figures were numbered sequentially and were referred to within the text in Attachment A.

**5. Page A-1, Site 14 - Old Dump No. 3.** The Site Investigation Activities section is confusing as currently written. It would be clearer to remove the references to Remedial Investigation activities and simply state in the opening sentence that a limited site investigation was performed at Site 14, and then go on to summarize the activities and results.

**6. Page A-1, Site 14 - Old Dump No. 3.** The Risk Assessment section is misleading as currently written. It is our understanding that no sampling occurred at this site, so there are no contaminant concentrations to compare with regulatory risk screening levels. This section must be rewritten to clarify that no risk assessment was performed because no samples were collected for analysis.

**7. Page A-1, Site 14 - Old Dump No. 3.** The first sentence in the Conclusions section should read "The location of Dump No. 3 in the field could not be determined." We also suggest that the timeframe for construction of the runway and taxiways (the 1950s) be added at the end of the second sentence.

**8. Page A-1, Site 15 - Merriconeag Extension Debris Site.** The second sentence of the Site Description section should state that the small unnamed stream drains into the north end of Harpswell Cove. The last sentence regarding the lack of Navy records should be moved to the Site Investigation Activities section.

**9. Page A-1, Site 15 - Merriconeag Extension Debris Site.** There appears to be some inconsistency with terminology in the Site Investigation Activities sections for Sites 15, 16, and 18. The term "site inspection" is used in the first sentence, and the acronym "SI" is used in the second sentence. Is there a difference between a Site Investigation and a Site Inspection? The SI acronym should refer to a Site Investigation, according to the second paragraph on the preceding signature page. Terms should be used consistently throughout the document.

**10. Page A-2, Site 15 - Merriconeag Extension Debris Site.** The Risk Assessment section should be revised to state that a detailed risk assessment was not performed. The section should also include a summary of the specific contaminants found, their maximum concentrations, and the regulatory risk screening level they were compared with. In addition, the statement that no contaminants exceeded regulatory screening levels is incorrect. We note that page 5-7 of the October 1993 *Site Inspection Report, Swampy Road Debris Site and Merriconeag Extension Debris Site* states that detection of 4,4'-DDT at one location (1,800J ug/kg at SS-2) exceeded the site cleanup level (500 ug/kg) for the Building 95 removal action. This should be noted in the Consensus Statement, along with the conclusion that, based on all sampling data, 4,4'-DDT was not widespread at those concentrations.

**11. Page A-2, Site 16 - Swampy Road Debris Site.** The first sentence of the Site Description section should be amended to identify the unnamed stream as a tributary to Mere Brook. The third sentence should also be revised. As currently written, it implies that the debris at Site 16 was located in the stream itself. Our recollection is that virtually all the debris was found on the banks, and not in the stream. We also suggest that the last sentence be moved to the Site Investigation Activities section.

**12. Page A-2, Site 16 - Swampy Road Debris Site.** The meaning of "native soils" is not clear to some readers, so we suggest using "undisturbed" instead. The sentence regarding the initial surface soil sample results should include the year (1992) that the sample was collected. We also suggest that the word "verified" be replaced by "showed" in the following sentence.

**13. Page A-2, Site 16 - Swampy Road Debris Site.** The Risk Assessment section should be revised to state that a detailed risk assessment was not performed. The section should also include a summary of the specific contaminants found, their maximum concentrations, and the regulatory risk screening level they were compared with.

**14. Page A-2, Site 16 - Swampy Road Debris Site.** The second sentence in the Conclusions section contradicts the information presented in the Risk Assessment section. The sentence should be revised to include the exception of the elevated 1992 lead result. The "unnamed stream" in the third sentence should be revised to read the "unnamed tributary to Mere Brook".

**15. Page A-3, Site 18 - West Runway Study Area.** We suggest that the soda bottle be described in the Site Description section as "discarded". We also suggest that the last two sentences in the section be moved to the Site Investigation Activities section.

**16. Page A-3, Site 18 - West Runway Study Area.** The phrase "innocuous metallic objects" should be replaced with appropriate descriptive terms, such as "construction debris" or "household refuse". We also suggest removing the opening passage of the last sentence in the Site Investigation Activities section so that the sentence simply states that an additional round of water samples were collected from the three seep locations in spring 1994.

**17. Page A-3, Site 18 - West Runway Study Area.** The Risk Assessment section should be revised to state that a detailed risk assessment was not performed. The section should also include a summary of the specific contaminants found, their maximum concentrations, and the regulatory risk screening level they were compared with.

**18. Attachment B, Figure 2-1.** The site numbers for Sites 14, 15, 16, and 18 should be added to the site names shown on the map. We are also concerned that the location of Site 15 may be inaccurate.

**19. Attachment B, Figure 3-2.** The site number should be added to the figure.

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**20. Attachment B, Figure 3-3.** The site number should be added to the figure. The unnamed tributary to Mere Brook should also be labeled as such.

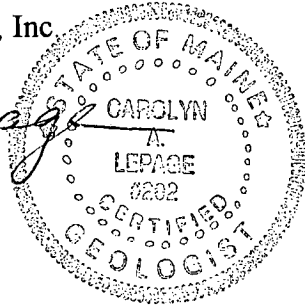
We would be happy to answer any questions you might have. Please do not hesitate to give us a call.

Sincerely,

Lepage Environmental Services, Inc.



Carolyn A. Lepage, C.G.  
President



cc: Tom Fusco (BACSE)  
Ed Benedikt (BACSE)  
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